EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

DEQUE SYSTEMS INC.

       Plaintiff,

   v.

BROWSERSTACK, INC., and
BROWSERSTACK LIMITED, and
BROWSERSTACK SOFTWARE PVT. LTD.,

       Defendants.

Case No. 1:24-cv-00217-AJT-WEF

DEFENDANTS BROWSERSTACK, INC., BROWSERSTACK SOFTWARE PVT. LTD., AND BROWSERSTACK LIMITED'S OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION

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Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Eastern District of Virginia, Defendants BrowserStack, Inc. ("BrowserStack U.S."), BrowserStack Software Pvt. Ltd. ("BrowserStack Software India") and BrowserStack Limited ("BowserStack Ireland")[1] (collectively, "Defendants" or "BrowserStack") hereby serve the following objections to Plaintiff Deque Systems, Inc.'s ("Plaintiff's" or "Deque's") first set of requests for production of documents.

GENERAL OBJECTIONS

Defendants make the following general objections to each and every request, and these objections are incorporated into each set of specific objections for each response by reference as if set forth fully therein. A specific response may repeat a general objection for emphasis or some other reason. Defendants' failure to include any general objection in any specific response shall not constitute a waiver of any general objection to that request.

1.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek information or documents protected by any privilege, including without limitation the attorney-client privilege, the work product doctrine, the joint defense privilege, the common interest privilege, the settlement privilege, or any other applicable claim of privilege, law, agreement or rule ("Privileged Information"). Defendants will not produce Privileged Information, and any undertaking by Defendants to provide information or documents should be understood to exclude Privileged Information. Any inadvertent disclosure or production

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[1] Defendant BrowserStack Ireland hereby joins in these objections insofar as it remains a defendant in this action as of today's date. However, because the proposed first amended complaint removes BrowserStack Ireland as a named defendant, BrowserStack Ireland further generally objects to these requests for production to the extent that they require BrowserStack Ireland, who will not be a party to this action, to produce documents in its possession, custody, or control.

of information or documents shall not be deemed a waiver of any privilege, protection, or exemption with respect to such information or documents. Defendants specifically reserve the right to demand the return of any materials that may constitute or contain Privileged Information.

2.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek to impose obligations beyond those required by the Federal Rules of Civil Procedure (including Rules 26 and 34), the Local Rules of this Court, any Court order, or any other applicable order or authority.

3.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they are vague, ambiguous, unintelligible, overly broad, unduly burdensome, duplicative, cumulative, unlimited in time or scope, or otherwise unclear as to the information or documents sought.

4.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent that they are overbroad, unduly burdensome, oppressive, irrelevant to the claims or defenses of any party, and not proportional to the needs of this case.

5.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek production of information or documents outside of the possession, custody or control of any BrowserStack defendant, or information otherwise not known or reasonably known to any BrowserStack defendant. Any objection on this ground does not constitute a representation or admission that such information or documents in fact exist.

6.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek production of information or documents in the possession, custody or control of Plaintiff.

7.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek production of information or documents in the possession, custody or control of one or more third parties.

8.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek production of information or documents available through public sources and thus are equally available to Plaintiff.

9.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they seek information or documents that are confidential, sensitive, trade secret and/or proprietary to BrowserStack. Defendants shall produce such information or documents pursuant only to an applicable and adequate protective order entered in this action, and, where applicable (*e.g.*, for source code), under the terms of an adequate inspection protocol.

10.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they require Defendants to disclose information or documents that BrowserStack is required to maintain in confidence pursuant to an agreement or understanding with any third party.

11.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they require legal conclusions or seek information or documents more properly the subject of expert discovery.

12.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent they require Defendants to produce information or documents before the pleadings have been set or this case has become at issue, before Defendants have conducted discovery, before the parties have exchanged initial disclosures, or before Defendants have completed their investigation and analysis concerning Plaintiff's claims and allegations, and

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therefore Defendants are not yet able to determine the information or documents relevant and responsive to Plaintiff's requests. Accordingly, Defendants reserve all rights to further amend and supplement their objections, responses, and production in response to Plaintiff's requests.

13.   Defendants object to the requests, and the accompanying definitions and instructions, to the extent that they seek information outside of a time period relevant to this case.

14.   Defendants object to the definition of "document" as vague, ambiguous, overly broad, unduly burdensome, and shall construe "document" to be consistent with Rule 34 of the Federal Rules of Civil Procedure.

15.   Defendants object to definition of "website accessibility testing" and "web accessibility testing" as uncertain, vague, ambiguous, and unnecessary, and will give these terms their ordinary meaning.

16.   Defendants object to definition of "axe core®" as uncertain, vague, ambiguous, unduly burdensome, not proportional to the needs of this case, and unnecessary to the extent it purports to encompass any software other than Deque's axe-core npm module licensed under the Mozilla Public License, version 2.0 and available at https://github.com/dequelabs/axe-core.

17.   Defendants object to definition of "Axe DevTools®" as vague, ambiguous, overly broad, unduly burdensome, and not proportional to the needs of this case. Defendants shall interpret "Axe DevTools®" as the "Axe DevTools®" asserted and alleged in the Complaint as copyrighted and infringed by BrowserStack.

18.   Defendants object to definition of "Rule Help Pages" or "Rules Help Page" as vague, ambiguous, overly broad, unduly burdensome, and not proportional to the needs of this case. Defendants shall interpret "Rule Help Pages" or "Rules Help Page" as the "Rule Help Pages"

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or "Rules Help Page" which are asserted and alleged in the Complaint as copyrighted and infringed by BrowserStack.

19.   Defendants object to the definition of "BrowserStack" as vague, ambiguous, overly broad, unduly burdensome, and not proportional to the needs of this case, including without limitation to the extent it includes people or entities outside of BrowserStack, Inc., BrowserStack Limited, or BrowserStack Software India Pvt. Ltd. BrowserStack shall interpret this term to mean BrowserStack. Inc., BrowserStack Limited, or BrowserStack Software India Pvt. Ltd., individually or collectively.

20.   Defendants object to definition of "Accessibility Toolkit" as vague and ambiguous, and shall refer to the "Accessibility Toolkit" as the "Accused Product" and interpret it to mean the accused BrowserStack Accessibility Toolkit browser extension described in Plaintiff's Complaint, including in paragraphs 34-40 therein.

21.   Defendants object to the requests, and the accompanying definitions and instructions to the extent they may be inconsistent with the Order Establishing ESI Protocol (ECF 38) entered in this action on May 1, 2024, or any subsequent agreement of the parties or order of the Court that may be entered in this action.

22.   Any response or any failure to make a specific objection to a particular individual request, is not, and shall not be construed as, an admission that responsive information exists, or is known or reasonably available to Defendants.

23.   Any agreement to produce or any production of information or documents in response by Defendants to any request does not constitute an admission, concession, or acknowledgement by Defendants of any conclusion or implication, factual or otherwise, that may be suggested or drawn from such request.

24.   Defendants object insofar as the requests do not provide sufficient time for Defendants to complete their investigation, identification, collection, analysis, review, and production of responsive documents within 30 days of service of these requests. BrowserStack has been undertaking efforts to identify and collect documents in response to these requests, and is available to meet and confer with Plaintiff regarding the ongoing status of its efforts and timing of any production.

25.   Defendants' objections are based on information presently in their possession, custody, and control based on their reasonable search and inquiry. Defendants provide their objections without prejudice to their rights to obtain and present additional information discovered in the future, such as through further investigation, discovery, or otherwise.

26.   Defendants reserve any and all other objections that may be applicable to these requests, definitions, and instructions, and reserves all rights to assert any other such applicable objections upon the narrowing or identification of the documents requested or during the meet and confer of counsel.

SPECIFIC OBJECTIONS

Request to Produce 1:

All source code for all components of all versions of the Accessibility Toolkit.

Objections to Request to Produce 1:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action, including one that provides adequate protection for the inspection of source

code. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production Nos. 2 and 3. BrowserStack objects to the extent this request seeks information already in the possession, custody or control of Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including insofar as it seeks "All source code" and "all components" of "all versions." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 2:

The full source code control history, including all commits and branches for all source code which leads to the production of the Accessibility Toolkit.

Objections to Request to Produce 2:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action, including one that provides adequate protection for the inspection of source code. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for

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production Nos. 1 and 3. BrowserStack further objects to this request as it seeks information not reasonably accessible to BrowserStack, and information that is overly burdensome to collect and produce and which is not relevant to any claim or defense in this case. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including insofar as it seeks the "full source code control history" and "all commits and branches" for "all source code." BrowserStack further objects to the phrase "which leads to the production of" as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case. BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 3:

All log files from any source code collaboration platform (e.g., Github.com, Gitlab, etc.) used to review and approve source code changes for all source code leading to the production of the Accessibility Toolkit.

Objections to Request to Produce 3:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order

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entered in this action, including one that provides adequate protection for the inspection of source code. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production Nos. 1 and 2. BrowserStack objects to this request as it seeks information not reasonably accessible to BrowserStack, is overly burdensome to collect and produce, and is not relevant to any claim or defense in this case. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All log files," "any source code collaboration platform," "used to review and approve source code changes," "all source code," and "leading to the production of." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 4:

All documents related to all published instances of the Accessibility Toolkit on the Chrome Web Store.

Objections to Request to Produce 4:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order

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entered in this action. BrowserStack objects to the extent this request seeks information or

documents not in the possession, custody or control of BrowserStack, already in the possession,

custody or control of Plaintiff, or available through public or third-party sources and thus equally

available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly

broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the

parties nor proportional to the needs of the case, including with its use of the terms, "All

documents" and "all published instances." BrowserStack further incorporates its general

objections to the definitions, including the definition of "Accessibility Toolkit," as though fully

set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this

request, including upon further investigation and discovery, and upon the further meet and confer

with counsel.

Request to Produce 5:

All documents concerning BrowserStack work with Deque open source software axe

core®, including, but not limited to, all internal forks and copies of all repositories containing such

work and full commit histories for same.

Objections to Request to Produce 5:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack

objects to the extent this request seeks production of Privileged Information. BrowserStack objects

to the extent this request seeks confidential, proprietary or trade secret information of

BrowserStack; such information will be produced only subject to an adequate protective order

entered in this action. BrowserStack objects to the extent this request seeks information or

documents not in the possession, custody or control of BrowserStack, or already in the possession,

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custody or control of Plaintiff. BrowserStack objects this this request as it seeks documents related

to axe core®, which is not at issue in the Complaint, nor relevant to any claim or defense in this

case. BrowserStack further objects to the extent it does not seek information from a relevant time

frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly

burdensome, and not seeking information relevant to the claims or defenses of the parties nor

proportional to the needs of the case, including with its use of the terms, "concerning BrowserStack

work," "all internal forks and copies," "all repositories containing such work," and "full commit

histories for same." BrowserStack further incorporates its general objections to the definitions,

including the definition of "axe core®" as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this

request, including upon further investigation and discovery, and upon the further meet and confer

with counsel.

Request to Produce 6:

All Documents concerning issues used during the development process of the Accessibility

Toolkit.

Objections to Request to Produce 6:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack

objects to the extent this request seeks production of Privileged Information. BrowserStack objects

to the extent this request seeks confidential, proprietary or trade secret information of

BrowserStack; such information will be produced only subject to an adequate protective order

entered in this action. BrowserStack objects to the extent this request seeks information or

documents not in the possession, custody or control of BrowserStack, already in the possession,

custody or control of Plaintiff, or available through public or third-party sources and thus equally

available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All Documents," "concerning issues used," and "during the development process." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack further objects to this request as it is unintelligible and ambiguous as propounded.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 7:

All documents related to the requirements, designs or proposals for development of the Accessibility Toolkit.

Objections to Request to Produce 7:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the

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claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents" and "related to the requirements, designs or proposals for development of." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 8:

All documents concerning research reports and artifacts made during development of the Accessibility Toolkit.

Objections to Request to Produce 8:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "research reports," "artifacts," and "during development."

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BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 9:

All documents and communications related to Deque or accessibility testing software, including, but not limited to, requirements, algorithms, testing, or development, for any BrowserStack employee, agent or contractor with access to the email accounts listed on Exhibit A hereto.

Objections to Request to Produce 9:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame.

BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents and

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communications," "accessibility testing software," "access to," "requirements, algorithms, testing

or development," "for any BrowserStack employee, agent or contract with access to," and "Exhibit

A." BrowserStack further incorporates its general objections to the definitions as though fully set

forth herein. BrowserStack also objects to this request as facially overly broad and unduly

burdensome, and calls for information not relevant to the claims or defenses of the parties, nor

proportional to the needs of the case by requesting, "All documents and communications related

to Deque or accessibility testing software" and also seeking through the attached Exhibit A

information related to approximately 106 email addresses regardless of whether any of have any

relevance to the allegations in the Complaint.

BrowserStack reserves the right to supplement, amend, or revise its objections to this

request, including upon further investigation and discovery, and upon the further meet and confer

with counsel.

Request to Produce 10:

All documents that mention or otherwise concern Deque.

Objections to Request to Produce 10:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack

objects to the extent this request seeks production of Privileged Information. BrowserStack objects

to the extent this request seeks confidential, proprietary or trade secret information of

BrowserStack; such information will be produced only subject to an adequate protective order

entered in this action. BrowserStack objects to the extent this request seeks information or

documents not in the possession, custody or control of BrowserStack or in the possession, custody

or control of Plaintiff, or seeks information or documents available through public or third-party

sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does

not seek information from a relevant time frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "that mention" and "otherwise concern." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 11:

All documents that mention or otherwise concern the Axe DevTools®.

Objections to Request to Produce 11:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as

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vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "that mention," "otherwise concern," and "the Axe DevTools®." BrowserStack further incorporates its general objections to the definitions, including the definition of "Axe DevTools®," as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 12:

All documents that mention or otherwise concern the Rule Help Pages.

Objections to Request to Produce 12:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the

claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "that mention," "otherwise concern," and "the Rule Help Pages." BrowserStack further incorporates its general objections to the definitions, including the definition of "Rule Help Pages," as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 13:

All non-privileged documents concerning this Lawsuit.

Objections to Request to Produce 13:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All" and "concerning." BrowserStack also objects to this request as facially overly

broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case. To the extent that this request seeks non-privileged documents not covered by any other requests, BrowserStack objects to this request as it does not seek any documents relevant to any claim or defense in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 14:

All non-privileged documents concerning any correspondence sent by or on behalf of Deque or its attorneys to BrowserStack, or its attorneys.

Objections to Request to Produce 14:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All," "concerning," "or on behalf of," or "its attorneys." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack

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also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 15:

All documents concerning the registration of any BrowserStack employee, agent or contractor of any version of Deque software, including, but not limited to, trial, beta, free or paid versions.

Objections to Request to Produce 15:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents in the possession, custody or control of Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "any BrowserStack employee, agent or contractor," and "any version of Deque software." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially

overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 16:

All documents concerning the purchase of licenses for any Deque software, including the purchases describe in ¶¶ 42 and 43 of the Complaint.

Objections to Request to Produce 16:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents in the possession, custody or control of Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "purchase of licenses," and "any Deque software." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly

burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 17:

All documents concerning Deque's Website Terms of Use and the Pro Software License described on ¶ 46 of the Complaint.

Objections to Request to Produce 17:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents" and "concerning." BrowserStack also objects to this request as facially

overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 18:

All documents sufficient to identify all persons who have at any time used or have been licensed to use the Axe DevTools®.

Objections to Request to Produce 18:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests discovery requests, including without limitation request for production No. 16. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the

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case, including with its use of the terms, "All documents," "identify," "all persons," and "who have at any time used or have been licensed to use." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 19:

All documents sufficient to identify any attempts to de-minimize, de-obfuscate, decompile or otherwise reverse engineer the code for any Axe DevTools® software or product, including browser extensions.

Objections to Request to Produce 19:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff.

BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor

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proportional to the needs of the case, including with its use of the terms, "All documents," "identify," "any attempts," and "any Axe DevTools® software or product." BrowserStack further incorporates its general objections to the definitions, including the definition of "Axe DevTools®," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 20:

All documents sufficient to identify when BrowserStack's services were developed for web accessibility testing.

Objections to Request to Produce 20:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "identify," and "services were developed for web accessibility testing." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack shall interpret this request as seeking documents sufficient to identify when BrowserStack developed the Accused Product.

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BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 21:

All documents concerning the development, creation and/or deployment of the Accessibility Toolkit.

Objections to Request to Produce 21:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production Nos. 4, 6-9, 20, 22. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents" and "concerning." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 22:

All documents that identify when the Accessibility Toolkit was developed.

Objections to Request to Produce 22:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation request for production No. 20. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents" and "identify." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 23:

All agreements and correspondence between BrowserStack and any employee, independent contractor, or other individual or entity who contributed in any way to the software or content for the Accessibility Toolkit, including but not limited to, anyone involved in the development of features for web accessibility testing.

Objections to Request to Produce 23:

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BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All agreements and correspondence," "any employee, independent contractor, or other individual or entity," "contributed in any way," "the software or content," and "anyone involved." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 24:

All documents concerning the efforts of BrowserStack or any employee, independent contractor, or other individual or entity acting on its behalf, to reverse engineer or use any method, automated software, or devices, such as spiders, robots or data mining techniques, such as scraping,

spidering, crawling or any other techniques, to download, store, distribute or otherwise reproduce software or content from the Axe DevTools®.

Objections to Request to Produce 24:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation request for production No. 19. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "efforts," "other individual or entity acting on its behalf," "reverse engineer," "use any method," "automated software, "devices," "any other techniques," "download, store, distribute or otherwise reproduce," and "software or content" code," and "the Axe DevTools®." BrowserStack further incorporates its general objections to the definitions, including the definition of "Axe DevTools®," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 25:

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All documents relating to any evaluation or performance testing of any Deque software.

Objections to Request to Produce 25:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "any evaluation or performance testing," and "any Deque software." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 26:

All documents concerning the efforts of BrowserStack to test the speed or evaluate the performance of the Accessibility Toolkit.

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Objections to Request to Produce 26:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "the efforts," "test the speed or evaluate the performance." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 27:

All documents, including but not limited to infrastructure logs reports or other types of architectural reports, concerning changes to BrowserStack's web accessibility testing services

implemented, either through the use of internal or external software tools (whether open source or paid).

Objections to Request to Produce 27:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action, including one that provides adequate protection for the inspection of source code. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production Nos. 1-3, 20 and 22. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "other types of architectural reports," "concerning," "changes," "web accessibility testing services implemented," and "use of internal or external software tools." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case. BrowserStack also objects to this request as vague, ambiguous, and unintelligible.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

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Request to Produce 28:

All business plans concerning web accessibility testing.

Objections to Request to Produce 28:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All business plans" and "concerning." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 29:

All business plans concerning rules for web accessibility testing.

Objections to Request to Produce 29:

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BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production No. 28. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All business plans," "concerning," and "rules." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 30:

All presentations concerning web accessibility testing.

Objections to Request to Produce 30:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects

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to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production No. 28. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All presentations" and "concerning." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 31:

All documents concerning customer's or potential customer's requests, desires or wishes for web accessibility testing.

Objections to Request to Produce 31:

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BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "customer's," "potential customer's," and "requests, desires or wishes." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as facially overly broad and unduly burdensome, and calls for information not relevant to the claims or defenses of the parties, nor proportional to the needs of the case.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 32:

All documents concerning lost sales, bids, contracts, or other business by BrowserStack for failure to offer web accessibility testing prior to the introduction of the Accessibility Toolkit.

Objections to Request to Produce 32:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "lost sales, bids, contracts, or other business," "by BrowserStack," and "for failure to offer web accessibility testing prior to the introduction of the Accessibility Toolkit." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as vague, ambiguous, and uncertain.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 33:

All correspondence or documents sent to any insurance carrier, investor or potential investor concerning this Lawsuit.

Objections to Request to Produce 33:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation request for production No. 13. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All correspondence or documents," "any insurance carrier, investor or potential investor," and "concerning."

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 34:

All documents concerning any efforts to register any copyrights or other intellectual property concerning web accessibility testing.

Objections to Request to Produce 34:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "any efforts," and "other intellectual property." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 35:

All documents concerning any efforts to register any copyrights or other intellectual property concerning rules for web accessibility testing.

Objections to Request to Produce 35:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action.

BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStackobjects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "any efforts," "other intellectual property," and "rules." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 36:

All documents concerning any claim made by a party other than Deque, that BrowserStack has infringed any intellectual-property right.

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Objections to Request to Produce 36:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "any claim made," and "any intellectual-property right." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 37:

All documents concerning any claim BrowserStack has asserted against a third party for infringement of any intellectual-property right.

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Objections to Request to Produce 37:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack objects to the extent this request requires a legal conclusion to be made. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "any claim," "asserted," and "any intellectual-property right." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 38:

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All documents concerning any comparisons (e.g., content, performance, etc.) between the Axe DevTools®, including its browser extensions, and any product or software offered by BrowserStack, including the Accessibility Toolkit.

Objections to Request to Produce 38:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production Nos. 25 and 26. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," "any comparisons," "etc.," "the Axe DevTools®," and "any product or software offered by BrowserStack." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

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Request to Produce 39:

All communications concerning any comparisons of any Deque product or software with any BrowserStack product or software, whether made internally or externally to BrowserStack, including any with customers or potential customers.

Objections to Request to Produce 39:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation requests for production No. 38. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All communications," "concerning," "any comparisons," "any Deque product or software," "any BrowserStack product or software," "made internally or externally" and "customers or potential customers." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 40:

Documents sufficient to identify the number of users that have accessed, used, or requested to use the Accessibility Toolkit since it was first launched.

Objections to Request to Produce 40:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "identify," "accessed, used, or requested to use," and "first launched." BrowserStack shall interpret this request as seeking the number of users who have registered or downloaded the Accused Product since the Accused Product became publicly available in the Chrome Store. BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack further objects to the extent that the documents sought by this request are not maintained in the ordinary course of business. BrowserStack further objects to the extent that information sought by this request would be more appropriately obtained through an alternative form of discovery such as by interrogatory.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 41:

Documents sufficient to show the number of registered users or purchases of the Accessibility Toolkit.

Objections to Request to Produce 41:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as duplicative of the information sought by or produced in response to other discovery requests, including without limitation request for production No. 40. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the term, "purchases." BrowserStack shall interpret this request as seeking the number of users who have registered or purchased the Accused Product since the Accused Product became publicly available in the Chrome Store. BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack further objects to the extent that the documents sought by this request are not maintained in the ordinary course of business. BrowserStack further objects to the extent that information sought by

this request would be more appropriately obtained through an alternative form of discovery such as by interrogatory.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 42:

Documents sufficient to show the pricing history for all services offered through the Accessibility Toolkit.

Objections to Request to Produce 42:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "all services offered" and "through." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 43:

Documents concerning the specific statements on BrowserStack's website regarding Accessibility Testing, including, but not limited to, those set forth in paragraphs 54-56 of the Complaint, and documents that support or refute the statements therein.

Objections to Request to Produce 43:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "concerning," "the specific statements on BrowserStack's website regarding Accessibility Testing," and "documents that support or refute the statements therein." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 44:

Documents sufficient to show monthly or quarterly advertising and promotional expenses for the Accessibility Toolkit and any other services offered by BrowserStack in conjunction with or including the Accessibility Toolkit.

Objections to Request to Produce 44:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "advertising and promotional expenses," and "any other services offered...in conjunction with or including." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack further objects to the extent that the documents sought by this request are not maintained in the ordinary course of business. BrowserStack further objects to the extent that information sought by this request would be more appropriately obtained through an alternative form of discovery such as by interrogatory.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 45:

Documents concerning the marketing, advertising or promotion of the Accessibility Toolkit whether solely or in conjunction with any other software services offered by BrowserStack.

Objections to Request to Produce 45:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "concerning," "marketing, advertising or promotion," "solely or in conjunction with," and "any other software services offered by BrowserStack." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 46:

Documents concerning bids for, or purchases of, Google Ads or other keyword-based online advertising related to Deque's Accessibility testing, at all times.

Objections to Request to Produce 46:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to the extent it does not seek information from a relevant time frame. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "concerning," "bids for," "other keyword-based online advertising," "Deque's Accessibility testing," and "at all times." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 47:

Documents concerning third-party press concerning accessibility testing software or services offered by BrowserStack.

Objections to Request to Produce 47:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "concerning, "third-party press," and "accessibility testing software or services offered by BrowserStack." BrowserStack further incorporates its general objections to the definitions as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 48:

All documents concerning customer reviews of the Accessibility Toolkit.

Objections to Request to Produce 48:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request seeks information or documents not in the possession, custody or control of BrowserStack, in the possession, custody or control of Plaintiff, or seeks information or documents available through public or third-party sources and thus equally available to Plaintiff. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "All documents," "concerning," and "customer reviews." BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack also objects to this request as it calls for documents not relevant to any of the claims or defenses in this action.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 49:

Documents sufficient to identify the amount and sources of all revenues BrowserStack has received, directly or indirectly, from the Accessibility Toolkit from the date the Accessibility Toolkit was launched through the present.

Objections to Request to Produce 49:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack objects to the extent this request requires a legal conclusion to be made or seeks information more properly the subject of expert discovery. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "identify," "sources," "all revenues," "directly or indirectly," and "the date the Accessibility Toolkit was launched" BrowserStack further incorporates its general objections to the definitions, including the definition of "Accessibility Toolkit," as though fully set forth herein. BrowserStack shall interpret this request as seeking the amount of revenue attributable to the Accused Product since the Accused Product became publicly available in the Chrome Store. BrowserStack further objects to the extent that the documents sought by this request are not maintained in the ordinary course of business. BrowserStack further objects to the extent that information sought by this request would be more appropriately obtained through an alternative form of discovery such as by interrogatory.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 50:

To the extent not otherwise produced in response to these Requests, all documents identified in Defendants' Rule 26(a)(1) Initial Disclosures.

Objections to Request to Produce 50:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the term, "all documents" and because BrowserStack has not yet served its Rule 26(a)(1) Initial Disclosures. BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 51:

To the extent not otherwise produced in response to these Requests, all documents identified in Defendants' responses to Deque's Interrogatories.

Objections to Request to Produce 51:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the term, "all documents" and because Plaintiff has not yet served any interrogatories on BrowserStack. BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Request to Produce 52:

To the extent not otherwise produced in response to these Requests, all documents upon which Defendants intend to rely in this case.

Objections to Request to Produce 52:

BrowserStack incorporates its general objections as if fully set forth herein. BrowserStack objects to the extent this request seeks production of Privileged Information. BrowserStack objects to the extent this request seeks confidential, proprietary or trade secret information of BrowserStack; such information will be produced only subject to an adequate protective order entered in this action. BrowserStack further objects to this request as vague, ambiguous, overly broad, unduly burdensome, and not seeking information relevant to the claims or defenses of the parties nor proportional to the needs of the case, including with its use of the terms, "all

documents" and "intend," and since Defendants have not yet determined all documents on which they intend to rely upon in this case. BrowserStack further incorporates its general objections to the definitions as though fully set forth herein.

BrowserStack reserves the right to supplement, amend, or revise its objections to this request, including upon further investigation and discovery, and upon the further meet and confer with counsel.

Dated: May 24, 2024   /s/   *Ryan Marton*

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Attorneys for Defendants BrowserStack, Inc., BrowserStack Limited, and BrowserStack Software India Pvt. Ltd.

<u>CERTIFICATE OF SERVICE</u>

I, the undersigned declare:

I am over eighteen years of age, a resident of the State of California and a citizen of the

United States, and not a party to the within action. My business address is 548 Market Street,

Suite 36117, San Francisco, California 94104. On the date set below, in the ordinary course of

business, I served the following document(s):

DEFENDANTS BROWSERSTACK, INC., BROWSERSTACK SOFTWARE PVT. LTD., AND BROWSERSTACK LIMITED'S OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION

by transmitting by electronic mail the document(s) listed above to the email address(es) below:

Jack Daniel Harkins, dharkins@dykema.com
Ryan Daniel Borelo, rborelo@dykema.com
Steven McMahon Zeller, szeller@dykema.com
Charles Wheeler Chotvacs, CChotvacs@dykema.com

I declare under the penalty of perjury under the laws of the United States of America that

the foregoing information is true and correct, and this Certificate of Service was executed on

May 24, 2024, at San Jose, California.

                                            /s/ *Songmee Connolly*
                                             Songmee Connolly